Virgin Records America, Inc v. Thomas Doc. 269

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
DULUTH DIVISION**

CAPITOL RECORDS, INC., *et al.*,

Plaintiffs,

vs.

JAMMIE THOMAS,

Defendant.

Case No.: 06cv1497-MJD/RLE

PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS

Pursuant to the Court's Third Amended Date Certain Trial Notice (Doc. No. 256, ¶ 2a), Plaintiffs respectfully request the opportunity to voir dire prospective jurors and, separately, submit the following proposed voir dire questions (Plaintiffs are not submitting questions relating to the jurors' background, such as employment information, or relating to whether the jurors are acquainted with any of the parties, counsel, or witnesses involved in this case, because Plaintiffs believe that the Court will be asking those kinds of questions):

1. Have any of you or anyone in your family sued anyone else before? Have any of you or anyone in your families ever been sued? What type of lawsuit? Was there a trial? What was the result? How did you feel about it?

2. Are any of you musicians? Do any of you have musicians in your families?

3. Have any of you or anyone close to you been involved in any kind of lawsuit with a big company like a corporation? What kind of lawsuit? Was there a trial? What was the result? How did you feel about it? Separate from being involved in any lawsuits, do any of you have any strong feelings or opinions about big companies in general? What feelings or opinions do you have? Why do you feel that way?

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4. How many of you use computers frequently? Are there any of you who do not use computers?

5. How many of you use the Internet on a regular basis? Are there any of you who have never used the Internet?

6. Of those who use the Internet, do any of you have a view as to whether music, books, or movies that you can download on the Internet are or should be free?

7. Have any of you ever downloaded music, books, or movies on the Internet? If you have done so, how did you do so? What program or programs did you use to do so?

8. Have any of you ever shared music, books, or movies on the Internet? If you have done so, how did you do so? What program or programs did you use to do so?

9. Have any members of your family (e.g., spouse or significant other or children) ever downloaded music, books, or movies on the Internet? If they have done so, how did they do so? What program or programs did they use to do so?

10. Have any members of your family (e.g., spouse or significant other or children) ever shared music, books, or movies on the Internet? If they have done so, how did they do so? What program or programs did they use to do so?

11. Have any of you ever purchased music on-line? How did you do so?

12. Have any of you heard of Napster? What have you heard about Napster? Have any of you heard of Grokster? What have you heard about Grokster? Have any of you heard of Kazaa? What have you heard about Kazaa? Have any of you ever used any of these programs? Do you have family members who have done so? Do you have friends who have done so?

13. Have any of you heard of lawsuits brought by record companies against people who download and share music files over the Internet? What have you heard about these lawsuits? Do you have any opinions or feelings about these lawsuits?

14. Have any of you heard about or read about this lawsuit? What have you read or heard about this lawsuit? Do you have an opinion or feeling about this lawsuit?

15. Have any of you heard that piracy on the Internet has had an effect on the recording industry? What have you heard about that? Do you have any opinions or feelings about that?

16. Do any of you feel that certain types of music should not be sold or protected under the law? What types of music would that be? Why do you feel that way?

17. Do any of you have any opinions about the recording industry in general? Do you have any opinions about record companies? Do you have any opinions about musicians? What are those opinions?

Respectfully submitted this 1st day of June 2009.

/s/ Timothy M. Reynolds

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